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Letter dated 18 April 2005 from the Chairman of the Security Council Committee established pursuant to resolution 1373 (2001) concerning counter-terrorism addressed to the President of the Security Council

I write with reference to my predecessor's letter of 21 November 2003 (S/2003/1124). The Counter-Terrorism Committee has received the attached third report from Brunei Darussalam submitted pursuant to paragraph 6 of resolution 1373 (2001) (see annex). I would be grateful if you could arrange for the present letter and its annex to be circulated as a document of the Security Council.

(*Signed*) Ellen Margrethe **Løj**
Chairman
Security Council Committee established pursuant to resolution 1373 (2001) concerning counter-terrorism

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Annex

Note verbale dated 18 March 2005 from the Permanent Mission of Brunei Darussalam to the United Nations addressed to the Chairman of the Counter-Terrorism Committee

The Permanent Mission of Brunei Darussalam presents its compliments to the Chairman of the Committee and has the honour to transmit herewith the third report of Brunei Darussalam in accordance with paragraph 6 of Security Council resolution 1373 (2001) (see enclosure).

Enclosure

Brunei Darussalam's third report to the Counter-Terrorism Committee

In regard to the implementation of the requirements of sub-paragraph 1 (a) of the Resolution 1373 "Prevent and suppress the financing of terrorist acts", please outline the domestic legislation adopted by Brunei Darussalam to implement the requirements of the International Convention for the Suppression of the Financing of Terrorism, in particular Articles 2,5,8 and 18.

1. The offences laid down under Articles 2 and 5 of the Convention are found in sections 3, 4 and 5 of the Anti-Terrorism (Financial and Other Measures) Order 2002.

2. Section 3 of the Anti-Terrorism (Financial and other Measures) Order prohibits any person in the territory of Brunei Darussalam, any national of Brunei Darussalam or any company incorporated or registered in Brunei Darussalam to provide funds to or collect funds for any person outside the territory of Brunei Darussalam by any means, directly or indirectly, where he knows or has reasonable grounds to suspect that the funds will be used to commit any terrorist act or facilitate the commission of any terrorist act.

3. Section 4 of the Anti-Terrorism (Financial and other Measures) Order prohibits any person in the territory of Brunei Darussalam, any national of Brunei Darussalam or any company incorporated or registered in Brunei Darussalam to do any of the following outside the territory of Brunei Darussalam:-

   a. deal, directly or indirectly, in any property that is owned or controlled by or on behalf of any terrorist or any other person owned or controlled by any terrorist, including funds derived or generated from property owned or controlled, directly or indirectly, by any terrorist or any other person owned or controlled by any terrorist;

   b. enter into or facilitate, directly or indirectly, any financial transaction relating to a dealing in property referred to in paragraph a, above; or

   c. provide any financial services or any other related services in respect of any property referred to in paragraph a, above to or for the benefit of, or on the direction or order of, any terrorist or any other person owned or controlled by any terrorist.

4. Section 5 of the Anti-Terrorism (Financial and other Measures) Order prohibits any person in the territory of Brunei Darussalam, any national of Brunei Darussalam or any company incorporated or registered in Brunei Darussalam to make available any funds, financial assets, or economic resources or provide any financial or related services for the benefit of any terrorist, any person owned or controlled by any terrorist, or any person acting on behalf of or at the direction of any terrorist or any person owned or controlled by any terrorist outside the territory of Brunei Darussalam.

5. Any person in the territory of Brunei Darussalam and any national of Brunei Darussalam who contravenes sections 3, 4, and 5 of the Order is guilty of an offence and liable on conviction to a fine not exceeding B$100,000, imprisonment for a term not exceeding five years or both.

6. Every person who commits or does any act with the intent to commit, or who counsels, procures, aids, abets or incites any other person to commit, or conspires with any other person (whether in Brunei Darussalam or elsewhere) to commit an offence under sections 3, 4 and 5 of the Order is guilty of an offence and liable on conviction to a fine not exceeding B$100,000, imprisonment for a term not exceeding five years or both.

7. Where an offence under sections 3, 4, and 5 have been committed by a body corporate is proved to have been committed with the consent or connivance of, or to be attributable to any neglect on the part of any director, manager, secretary or other similar officer of that body corporate or any person who was purporting to act in that capacity or any other person who holds a controlling interest in that body corporate, such a person as well as the body corporate, is guilty of that offence and liable to be proceeded against and punished accordingly.

8. With regard to the obligations under Article 8 of the Convention, section 12 of the Anti-Terrorism (Financial and Other Measures) Order 2002 directs that all financial institutions in Brunei Darussalam must freeze assets belonging to suspected individuals/organizations based on the Security Council Decision. All financial institutions are then required to report to the Minister of Finance whether there were any assets found belonging to individuals or entities as sanctioned by the Security Council within a specified period of time. A financial institution that fails to comply with the financial directive issued under section 12 of the Anti-Terrorism (Financial and Other Measures) Order 2002 is guilty of an offence and liable to a fine not exceeding $20,000.

9. Brunei Darussalam, as a member of the Asia Pacific Group on Anti-Money Laundering (APG), also observes and implements the Financial Action Task Force (FATF) 40 recommendations and 9 special recommendations.

Please outline the relevant provisions in Brunei Darussalam's laws, which oblige financial institutions to report suspicious financial transactions.

10. The duty to provide information concerning suspicious financial transaction and property is laid out in Section 8 of the Anti-Terrorism (Financial and Other Measures) Order 2002.

11. Sections 14 and 16 of the Money Laundering Order 2000 provides for internal reporting procedures for identifying and providing evidence of persons involved in money laundering.

Please explain whether Brunei Darussalam's laws extend the same reporting obligations, including penalties for non-reporting, to other non-financial institutions or entities (e.g., lawyers, notaries).

12. Currently the reporting obligation under the Money Laundering Order 2000 and the Anti Terrorism (Financial and Other Measures) Order 2002 is limited to relevant financial business as defined by the Money Laundering Order 2000 and do not extend the same reporting obligations to professionals such as lawyers and notaries.

13. The Schedule to the Money Laundering Order is going to be reviewed to widen the definition of financial businesses in order to comply with the FATF 40 recommendations and 9 special recommendations.

Please provide the penalties prescribed for violating reporting obligations. Is there a specific Financial Intelligence Unit or other supervisory body assigned to deal with reporting obligations?

14. Failure to provide information is an offence under section 8 of the Anti-Terrorism (Financial and Other Measures) 2002, which is liable to a fine not exceeding $100,000, imprisonment for a term not exceeding five years or both, as stated in section 13 of the Order.

15. The Financial Institution Division (FID) and Brunei International Financial Centre (BIFC) within the Ministry of Finance are the supervisory bodies dealing with reporting obligations.

Please outline the Section 42 of the Internal Security Act 1984:

- **Whether the term "any terrorist" includes foreign terrorists?**
- **Whether the term "security area" refers to territories outside Brunei Darussalam? If not, please indicate the steps which Brunei Darussalam intends taking in order to comply fully with the requirements of sub paragraph 1 (b) of the Resolution 1373**

"Criminalize the willful provision or collection, by any means, directly or indirectly, of funds by their nationals or in their territories with the intention that the funds should be used, or in the knowledge that they are to be used, in order to carry out terrorist acts"?

16. The term "terrorist" provided under the Internal Security Act 1984 does include foreign terrorists.

17. "Security area" under the Internal Security Act only refers to areas within the territory of Brunei Darussalam.

18. However, the Anti-Terrorism (Financial and Other Measures) 2002 provides that any person in Brunei Darussalam is prohibited from collecting funds for the commission of terrorist act(s) whether in Brunei Darussalam or elsewhere (and fully complies with the requirements of sub-paragraph 1(b) of the Resolution 1373).

Please provide particulars of how Brunei Darussalam currently meets, or proposes to meet, this current law or in proposed legislation which would enable the authorities of Brunei Darussalam to freeze funds, financial assets etc., at the request of another State.

19. The Criminal Conduct (Recovery of Proceeds) Order 2000 makes provisions for the enforcement of confiscation, restraint and charging orders made by the court and for facilitating the enforcement of foreign confiscation, forfeiture and restraint orders. Before the authorities of Brunei Darussalam are able to freeze funds, financial assets etc., at the request of another State, that State needs to be designated in the Schedule to the Order. Such designation will take place upon agreement between Brunei Darussalam and the other State. Currently, there is no designation of States under the Order.

20. Brunei Darussalam can consider requests for freezing of funds and financial assets by States Parties to the International Convention for the Suppression of the Financing of Terrorism. Requests can also be made through INTERPOL which will be facilitated by the Royal Brunei Police Force in accordance with section 11 of the Anti-Terrorism (Financial and Other Measures) Order 2002.

Please outline the legal provisions in force in Brunei Darussalam which regulate alternative money transfer agencies or services for effective implementation of paragraph 1 of the Resolution 1373, as follows:

- **Sub-paragraph 1 (a) of the Resolution 1373 "Prevent and suppress the financing of terrorist acts".**

- **Sub-paragraph 1 (b) of the Resolution 1373 "Criminalize the willful provision or collection, by any means, directly or indirectly, of funds by their nationals or in their territories with the intention that the funds should be used, or in the knowledge that they are to be used, in order to carry out terrorist acts"?**

- **Sub-paragraph 1 (c) of the Resolution 1373 "Freeze without delay funds and other financial assets or economics resources of persons who commit, or attempt to commit, terrorist acts or participate in or facilitate the commission of terrorist acts; of entities owned or controlled directly by such persons; and of persons and entities acting on behalf of, or at the direction of such persons and entities, including funds derived or generated from property owned or controlled directly or indirectly by such persons and associated persons and entities"**

- **Sub-paragraph 1 (d) of the Resolution 1373 "Prohibit their nationals or any persons and entities within their territories from making any funds, financial assets or economic resources or financial or other related services available, directly or indirectly, for the benefit of persons who commit or attempt to commit or facilitate or participate in the commission of terrorist acts, of entities owned or controlled, directly or indirectly, by such persons and of persons and entities acting on behalf of or at the direction of such persons.**

21. Currently, apart from banks, which are licensed under the Banking Act, (CAP 95) and the Islamic Banking Act (CAP 168), there are 34 remittance and 33 money – changing operators, which are licensed under the Money Remittance and Money Changing Order, 1994.

22. Under section 6(1) of the Money Remittance and Money Changing Order, 1994 "No person shall carry on any remittance business unless he is in possession of a valid remittance license."

23. Under section 6(2) of the Order, "A person who contravenes subsection (1) shall be guilty of an offence and shall be liable on conviction to a fine not exceeding $10,000 or to imprisonment for a term not exceeding one year or to both."

24. Brunei regulates its alternative remittance system through the above Order and any other operators which fall outside this Order is considered illegal and can be liable to a fine or imprisonment mentioned above.

In the absence of such provisions for the effective implementation of paragraph 1 of the Resolution 1373 (as above), please indicate the steps in which Brunei Darussalam intends taking in order to incorporate this aspect of Resolution, into Brunei Darussalam's domestic law.

25. Not applicable as Money Remittance and Money Changing Order, 1994 regulates the alternative remittance system in Brunei Darussalam.

Brunei Darussalam indicates, in Section 6 of the Immigration Act 1958 applies, unless an exemption is consistent with the requirements of the sub-paragraphs? Please indicate whether Section 8 of the Immigration Act 1958 treats a person suspected of terrorist activity as "a prohibited immigrant person".

26. Under section 8(k) of the Immigration Act, "a prohibited immigrant person" includes a person suspected of terrorist activity based on information received by the Controller of Immigration from a reliable source or from another State through official or diplomatic channels.

The effective implementation of sub-paragraph 2 (d) of the Resolution 1373 "Prevent those who finance, plan, facilitate or commit terrorist acts from using their respective territories for those purposes against other States or their citizens". Brunei Darussalam (in the supplementary report) indicates that there are no specific provisions in the current law of Brunei Darussalam dealing with this aspect of the Resolution. Please indicate on how Brunei Darussalam will remedy this matter.

27. Financing of terrorism is covered by the Anti-Terrorism (Financial and other Measures) Order 2002 and section 42 of the Internal Security Act 2002.

28. Since Brunei Darussalam does not have specific laws dealing with planning, facilitating or committing terrorist acts, it will introduce a number of specific terrorist offences under its laws. For the time being Brunei Darussalam uses its preventive laws under the Internal Security Act 1984 to deal with this matter.

29. Brunei Darussalam will also enact the Mutual Assistance in Criminal Matters Order to facilitate international assistance in criminal matters, including:

(a) the obtaining of evidence, documents, articles or other things;
(b) the making of arrangements for persons, including detained persons to give evidence or assist investigations;
(c) the confiscation of property in respect of offences;

(d) the service of documents;
(e) the identification and location of persons;
(f) the execution of requests for search and seizure;
(g) providing originals or certified copies of relevant documents and records, including government, bank, financial, corporate or business records. Government records may be provided in accordance with whether or not they are in the public domain within the laws of Brunei Darussalam; and
(h) any other type of assistance that is not contrary to the laws of Brunei Darussalam.

30. When the Mutual Assistance in Criminal Matters Order comes into force, it will complement the Criminal Conduct (Recovery of Proceeds) Order 2000 and the Anti-Terrorism (Financial and other Measures) Order 2002. In this regard, paragraph 2(d) of Security Council Resolution 1373 will be effectively implemented.

Effective implementation of sub-paragraphs 2 (d) and (e) of the Resolution 1373: 2 (d) "Prevent those who finance, plan, facilitate or commit terrorist acts from using their respective territories for those purposes against other States or their citizens" and 2 (e) "Ensure that any person who participates in the financing, planning, preparation or perpetration of terrorist acts or in supporting terrorist acts is brought to justice and ensure that, in addition to any other measures against them, such terrorists acts are established as serious criminal offences in domestic laws and regulations and that the punishment duly reflects the seriousness of such terrorist acts" requires each State to make it a criminal offence for anyone to use its territory for purpose of committing a terrorist act against another State or its citizens or for the purpose of financing, planning and facilitating the commission of terrorists act has been committed or attempted. Are the relevant provisions of the Criminal Law of Brunei Darussalam applicable in all of the following circumstances:

- **Acts committed outside Brunei Darussalam by a person who habitually resides in, Brunei Darussalam (whether that person is currently present in Brunei Darussalam or not);**

- **Acts committed outside Brunei Darussalam by a foreign national who is currently in Brunei Darussalam?**

31. Brunei courts do not have jurisdiction over criminal acts committed outside the territory of Brunei Darussalam by a person who is habitually resident in the territory of Brunei Darussalam. Brunei courts have jurisdiction over criminal acts committed outside the territory of Brunei Darussalam by its

nationals only as provided under section 7(f) of the Criminal Procedure Code.

32. Brunei courts do not have jurisdiction over a foreign national who commits a criminal act outside the territory of Brunei Darussalam but is currently in Brunei territory. In the event that the acts committed outside the territory of Brunei Darussalam by a foreign nations who is currently in Brunei territory is extraditable under the Extradition Act, Brunei Darussalam shall extradite that foreign national provided that the requesting country is listed under the Act.

33. Brunei Darussalam is revising the Extradition Act and planning to introduce a comprehensive Anti-Terrorism legislation in order to better implement the obligations under the Security Council resolution 1373.

Brunei Darussalam states that "terrorist acts" are defined in section 2 of the Anti-Terrorism (Financial and Other Measures) Order 2002. Please outline this provision, as well as the other provisions in the laws of Brunei Darussalam as regards crimes which qualify as terrorist activities.

34. Section 2 of the Anti-Terrorism (Financial and Other Measures) Order 2002 defines "terrorist act" means the use or threat of action (whether in Brunei Darussalam or elsewhere) -

(a) where the action -

(i) involves serious violence against any person;
(ii) involves serious damage to property;
(iii) endangers any person's life;
(iv) creates a serious risk to the health or safety of the public or a section of the public;
(v) involves the use of firearms or explosives;
(vi) involves releasing into the environment or any part thereof, or distributing or otherwise exposing the public or any part thereof to –

(A) any dangerous, hazardous, radioactive or harmful substance;
(B) any toxic chemical; or
(C) any microbial or other biological agent or toxin;

(vii) is designed to disrupt any public computer system or the provision of services directly related to communications infrastructure, banking, any financial services, public utilities, public transportation or public key infrastructure;

(viii) is designed to disrupt the provision of essential emergency services; or

(ix) involves prejudice to public security or national defence;

(b) where the use or threat is intended or reasonably regarded as intending to

(i) influence the Government or any other government; or

(ii) intimidate the public or a section of the public."

35. Under section 6 of the Anti-Terrorism (Financial and Other Measures) Order 2002, it is an offence to make false threats of terrorists' acts. Section 6 states that no person shall in Brunei Darussalam, and no citizen of Brunei Darussalam and no company incorporated or registered under the Companies Act (Chapter 39) shall outside Brunei Darussalam, communicate or make available by any means any information which he knows or believe to be false to any person with the intention of inducing in him or in any other person a false belief that a terrorist act has been, is being or will be carried out.

36. Section 42 of the Internal Security Act 2002 provides that any person who whether within or outside a security area demands, collects or receives any supplies from any other person in circumstances which raise a reasonable presumption that he intends, or is about, to act, or has recently acted, in a manner prejudicial to public security or the maintenance of public order, or that the supplies so demanded, collected or received are intended for the use of any person who intends or is about, so to act, or has recently so acted, or for the use of any terrorist, shall be guilty of an offence. The penalty for such an offence is imprisonment for life.

Brunei Darussalam states that under Section 5 of the Extradition Act 1984(?), one of the restrictions in relation to the surrender of criminal offenders is that such offender will not be surrendered if the offence for which he is sought is an offence "of a political character". Brunei Darussalam also states that the Act in question "is presently under review with the intention to ensure that it is updated in accordance with current international practice". Please outline the progress report on this.

37. The Attorney General's Chambers has produced the first draft revising the Extradition Act. It is contemplated that instead of using the 'list system' for extradition crimes as found in the present Act, a 'penalty based' approach will be used. It is also contemplated that the restriction on non-extradition for an offence of political character will also be redefined in accordance with the London Scheme for Extradition within the Commonwealth.

Please indicate whether the Extradition Act 1983 provides for the application of the principle aut dedere aut judicare (Duty to Extradite or Prosecute in International Law) in relation to the offences referred to in sub-paragraph 2(c) of the Resolution 1373 "Deny safe haven to those who finance, plan, support or commit terrorists acts, or provide safe havens"?

38. Generally, the principle is applied provided that it is an extraditable offence and that the countries are designated in the Schedule under the current Extradition Act. However, Brunei Darussalam currently only recognizes certain terrorist acts under specific anti-terrorism conventions which have been given force of law in Brunei Darussalam to be extraditable offences for the purpose of our Extradition Act. These are the Hague Convention for the Suppression of Unlawful Seizure of Aircraft and the Montreal Convention for the Suppression of Unlawful Acts against the Safety of Civil Aviation which has been given force of law under the Hijacking and Protection of Aircraft Order 2000 and the Tokyo Convention on Offences and Certain Other Acts Committed on Board Aircrafts which has been given force of law under the Tokyo Convention Order 2000.

Are those offences listed in the Schedule of the Extradition Act 1983?

39. These offences are not listed in the current Extradition Act. However, Brunei Darussalam provides extradition for other offences relating to terrorist acts which include: offence of Harboring Offenders (s.217 of the CPC; offences and certain acts committed on board an aircraft; offences of hijacking and unlawful acts against safety of aircraft; and offences against internationally protected persons.

If the answer to the last question is in the affirmative, please outline the crimes set out in the list.

40. Not applicable.

If the answer is in the negative, please outline of the steps which Brunei Darussalam intends taking in order to comply with this aspect of the Resolution.

41. As stated in paragraph 32, the proposed new Extradition Act will use a penalty-based approach in relation to extraditable offences. The offences referred to in paragraph 2(c) of the Resolution will fall within the category of extraditable offences.

Please outline the legal or other measures which enable the authorities of Brunei Darussalam to provide assistance in matters of criminal investigation and judicial proceedings, as required under sub-paragraph

2(f) of the Resolution 1373 "afford one another the greatest measure of assistance in connection with criminal investigations or criminal proceedings relating to the financing or support of terrorist acts, including assistance in obtaining evidence in their possession necessary for the proceedings".

42. Please refer to paragraphs 47 and 48 of the supplementary report of Brunei Darussalam informing of the Public Prosecutor's general power to direct any criminal investigation and judicial proceedings on behalf of foreign law enforcement agencies.

43. Furthermore, under the Extradition Act, the Attorney General may require a magistrate to take evidence for the purposes of any criminal matter pending in any court in any foreign state from any witness who shall be compelled to attend and answer questions and produce documents as deemed necessary.

44. Any request by foreign law enforcement agencies to assist them is currently forwarded to the Attorney General through diplomatic channels or through INTERPOL and ASEANAPOL.

Brunei Darussalam indicates, in its supplementary report, that it may provide assistance in criminal matters to Member States of the Commonwealth. Please outline the legal and administrative provisions which Brunei Darussalam has put in place to enable it to comply with this aspect of the Resolution as regards States which are not members of the Commonwealth.

45. The draft Mutual Assistance in Criminal Matters Order has been finalized and about to be submitted to the legislative authority for enactment.

Please outline the progress report on the ratification by Brunei Darussalam of the remaining instruments relating to terrorism to which Brunei Darussalam has yet to become a party.

46. Brunei Darussalam has ratified the Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation and the Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms located on the Continental Shelf on 4 December 2003. The draft Maritime Offences Order to implement the obligations under the Convention and Protocol is in its final drafting stages.

47. The Convention on the Marking of Plastic Explosives for the Purpose of Detection and the Convention on the Physical Protection of Nuclear Material are still under consideration.

Please state the progress report on the implementation in domestic law of the international instruments relating to terrorism which Brunei Darussalam has been ratified. In particular, a list of the penalties prescribed for offences created as required under the Conventions and Protocols.

48. The following Conventions have been incorporated into domestic laws: -

a. The Emergency (Tokyo Convention) Order 2000 gives effect to the provisions of the Tokyo Convention on the Offences and Certain Other Acts Committed on Board Aircrafts 1963. The offences are set out under section 2 of the Act and the corresponding penalties are reflected by the specific offences mentioned in the Penal Code.

b. The Emergency (Hijacking and Protection of Aircraft) Order 2000 gives effect to Hague Convention for the Suppression of Unlawful Seizure of Aircraft 1970. Any person guilty of an offence under this Order shall be liable on conviction to be punished with imprisonment for life.

c. The Internationally Protected Persons Act gives effect to the Convention on the Prevention and Punishment of Crimes Against Internationally Protected Persons, including Diplomatic Agents 1973. The offences are set out under section 2 of the Act and the corresponding penalties are reflected by the specific offences mentioned in the Penal Code.

d. The Emergency (Hijacking and Protection of Aircraft) Order 2000 gives effect to the Montreal Convention for the Suppression of Unlawful Acts Against the Safety of Civil Aviation 1971. Any person guilty of an offence under this Order shall be liable on conviction to be punished with imprisonment for life.

e. The Anti-Terrorism (Financial and Other Measures) Order 2002 gives effect to the International Convention for the Suppression of the Financing of Terrorism. Any person in Brunei Darussalam, and any citizen of Brunei Darussalam outside Brunei Darussalam, who contravenes sections 3, 4, 5, 6, 7 or 8 of this Order is guilty of an offence and liable on conviction to a fine not exceeding $100,000, imprisonment for a term not exceeding five years or both.

49. In relation to the following Conventions and Protocols, Brunei Darussalam's Penal Code also covers the offences provided under these Conventions/Protocols.

a. The International Convention Against the Taking of Hostages;

b. The Protocol for the Suppression of Unlawful Acts of Violence at Airports Serving International Civil Aviation;

c. International Convention for the Suppression of Terrorist Bombings.

Please outline Brunei Darussalam's report/response submitted to other organizations involved in monitoring international standards, as well as details of any efforts to implement international best practice, codes and standards which are relevant to the implementation of Resolution 1373.

50. Brunei Darussalam does not submit any report(s) pertaining to the implementation of Resolution 1373 to any other organizations.

51. In addition, Brunei Darussalam through Association of South East Asian Nations (ASEAN), Asia Pacific Economic Forum (APEC), ASEAN Regional Forum (ARF) and other regional co-operations, have agreed to organize joint projects, programmes, seminars and workshops to assist Brunei Darussalam in establishing international standards of combating terrorism in terms of law enforcement and legal framework.

B. Assistance and Guidance

Please outline the areas, in which assistance or advice might be of benefit to Brunei Darussalam in its implementation of the Resolution or of any areas in which Brunei Darussalam might be in position to offer assistance or advice to other States on the implementation of the Resolution.

52. Brunei Darussalam is interested in capacity-building programmes and technical assistance, as well as specialized training from other states in the following areas:

i. Asset forfeiture and asset tracing of funds related to terrorist activities;

ii. Analysis of suspicious transactions; and

iii. Supervising Alternative Remittance Services (ARS) and ways to tackle the problems posed by ARS.